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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-S-23-10423-MKN
Chapter 11

**SECOND STIPULATION TO EXTEND TIME
TO RESPOND TO DEBTOR'S:**

**1) FOURTH OMNIBUS MOTION FOR ENTRY
OF ORDER APPROVING REJECTION OF
EXECUTORY CONTRACTS AND UNEXPIRED
LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
DISPOSAL OF CERTAIN PERSONAL
PROPERTY INCLUDING SURRENDER AND
TERMINATION OF THE AUTOMATIC STAY
AND/OR ABANDONMENT [ECF 355];**

**2) FIFTH OMNIBUS MOTION FOR ENTRY OF
ORDER APPROVING REJECTION OF
EXECUTORY CONTRACTS AND UNEXPIRED
LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
DISPOSAL OF CERTAIN PERSONAL
PROPERTY INCLUDING SURRENDER AND
TERMINATION OF THE AUTOMATIC STAY
AND/OR ABANDONMENT [ECF 358];**

**3) SIXTH OMNIBUS MOTION FOR ENTRY OF
ORDER APPROVING REJECTION OF
EXECUTORY CONTRACTS AND UNEXPIRED
LEASES PURSUANT TO 11 U.S.C. § 365(a) AND
DISPOSAL OF CERTAIN PERSONAL
PROPERTY INCLUDING SURRENDER AND
TERMINATION OF THE AUTOMATIC STAY
AND/OR ABANDONMENT [ECF 361]; AND**

4) SEVENTH OMNIBUS MOTION FOR ENTRY OF ORDER APPROVING REJECTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES PURSUANT TO 11 U.S.C. § 365(a) AND DISPOSAL OF CERTAIN PERSONAL PROPERTY INCLUDING SURRENDER AND TERMINATION OF THE AUTOMATIC STAY AND/OR ABANDONMENT [ECF 364]; AND CONTINUANCE OF HEARINGS REGARDING SAME

Old Hearing Date: April 20, 2023

Old Hearing Time: 10:30 a.m.

Continued Hearing Date: May 18, 2023

Continued Hearing Time: 10:30 a.m.

Cash Cloud, Inc. (“Cash Cloud” or “Debtor”), debtor and debtor in possession in the above-captioned chapter 11 case (the “Chapter 11 Case”), by and through its undersigned counsel, Fox Rothschild LLP, and Enigma Securities Limited (“Enigma”), by and through its undersigned counsel, Morrison & Foerster LLP and Shea Larsen (collectively, the “Parties”), hereby enter into this *Second Stipulation To Extend Time To Respond To Debtor’s: 1) Fourth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 355]; 2) Fifth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 358]; 3) Sixth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 361]; And 4) Seventh Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 364]; And Continuance Of Hearings Regarding Same (“Stipulation”).*

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RECITALS

WHEREAS, Debtor filed the *Fourth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment* [ECF 355] (“Fourth Omnibus Motion”) on March 23, 2023;

WHEREAS, Debtor filed the *Fifth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment* [ECF 358] (“Fifth Omnibus Motion”) on March 23, 2023;

WHEREAS, Debtor filed the *Sixth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment* [ECF 361] (“Sixth Omnibus Motion”) on March 23, 2023; and

WHEREAS, Debtor filed the *Seventh Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment* [ECF 364] (“Seventh Omnibus Motion”) on March 23, 2023 (the Fourth Omnibus Motion, Fifth Omnibus Motion, Sixth Omnibus Motion, and Seventh Omnibus Motion are collectively referred to herein as “Omnibus Motions”);

WHEREAS, the hearings on the Omnibus Motions are set for April 20, 2023 at 10:30 a.m. (“Hearing Dates”);

WHEREAS, the Parties entered into a *Stipulation To Extend Time To Respond To Debtor’s:*

- 1) *Fourth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment* [ECF 355]; 2)
- Fifth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment* [ECF 358]; 3)

Sixth Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 361]; And 4) Seventh Omnibus Motion For Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(A) And Disposal Of Certain Personal Property Including Surrender And Termination Of The Automatic Stay And/Or Abandonment [ECF 364][ECF 384] extending the deadline for Enigma to file a response to the Omnibus Motions from April 6, 2023 to April 14, 2023 (“Response Deadline”) and the deadline for the Debtor to file a reply from April 13, 2023 to April 18, 2023 (“Reply Deadline”).

WHEREAS, the Parties have agreed to continue the Hearing Date to May 18, 2023 at 10:30 a.m.

WHEREAS, the Parties have agreed to continue the Response Deadline to May 4, 2023 and the Reply Deadline to May 11, 2023

STIPULATION

NOW, THEREFORE, in consideration of the foregoing, the parties agree as follows:

1. The Hearing Date is continued to May 18, 2023 at 10:30 a.m.;
1. The Response Deadline is continued to May 4, 2023; and
2. The Reply Deadline is continued to May 11, 2023.

Dated this 13th day of April, 2023.

FOX ROTHSCHILD LLP

By /s/ Jeanette E. McPherson

JEANETTE E. MCPHERSON, ESQ.

Nevada Bar No. 5423

BRETT A. AXELROD, ESQ.

Nevada Bar No. 5859

NICHOLAS A. KOFFROTH, ESQ.

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Counsel for Debtor

1 Dated this 13th day of April, 2023.

2 **MORRISON & FOERSTER LLP**

3 By: /s/ Andrew Kissner

4 GARY LEE, ESQ. (Admitted *Pro Hac Vice*)

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11 and

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